

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO: 2:19-cr-53
	:	
v.	:	JUDGE EDMUND A. SARGUS, JR.
	:	
ANDREW K. MITCHELL,	:	
	:	
Defendant.	:	

**JOINT MOTION OF DEFENDANT AND U.S. GOVERNMENT
TO CONTINUE ALL TRIAL DEADLINES**

Now comes Defendant, Andrew K. Mitchell, by and through Counsel, Mark C. Collins, who hereby requests a continuance of all trial dates and deadlines. Defendant continues to waive time for stated request. Assistant U.S. Attorney, Kevin W. Kelley, has no objection to the above styled request. The reasons for said request are more fully stated in the attached Memorandum in Support.

Respectfully submitted,

/s/ Mark C. Collins
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Attorneys for Defendant Andrew K. Mitchell

MEMORANDUM IN SUPPORT

As the Court is aware, Defense Counsel has been retained on Mr. Mitchell's State case; 19 CR 1662, a murder charge, set in front of the Honorable Judge Young, in the Common Pleas Court of Franklin County, as well as the above styled case. It is Counsel's belief that it is in Mr. Mitchell's best interest to focus on one matter at a time; that being the murder charge in the State case. As the Court is aware, parties have agreed that the Federal trial should follow the State trial. A status hearing is set in front of Judge Young, on January 14, 2021, where a trial date will be chosen. Therefore, parties respectfully request that the motion deadline of January 8, 2021, as well as all other trial dates and deadlines be continued until after Mr. Mitchell's State trial. Defendant by and through Counsel hereby again waives speedy trial rights in the above styled case. Therefore, based on interests of justice, said request is consented and joined by Assistant U.S. Attorney Kevin Kelley.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2021, I electronically filed the Motion to Continue with Judge Edmund A. Sargus, Jr., using the CM/ECF System, which will send notification of such filing to the following: Kevin W. Kelley, Esq.

/s/ Mark C. Collins

MARK C. COLLINS (0061207)